

U.S. DISTRICT COURT  
NORTHERN DIST. OF TX.  
FORT WORTH DIVISION

MAR 12 2004 9:20 AM

COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

RANDA HAHN

§

§

VS.

§

ACTION NO. 4:03-CV-855-Y

§

AMGEN, INC., ET AL.

§

§

**PLAINTIFF'S MOTION TO EXTEND DEADLINE FOR  
DESIGNATING PHYSICIANS AND MEDICAL EXPERTS**

Plaintiff moves for a 30-day extension of time to designate physicians and medical experts pursuant to the Court's December 17, 2003 Order Granting Motion to Bifurcate Discovery, Staying Non-Causation Discovery, and Setting Deadline for Summary-Judgment Motion Regarding Causation, respectfully showing the Court as follows:

Plaintiff has identified potential experts whom Plaintiff may designate pursuant to the Order. Plaintiff intends to forward the necessary documents and medical records to such potential experts for their review and consideration. Plaintiff needs additional time to forward the necessary documents and records, and the potential experts need additional time to review and consider such documents and records, before Plaintiff makes her designation pursuant to the Order.

Therefore, Plaintiff respectfully requests an additional 30 days to designate physicians and medical experts pursuant to the December 17, 2003 Order. Plaintiff does not seek this extension of time in order to delay the resolution of this case, but rather so that justice may be done.

**ORIGINAL**

**PLAINTIFF'S MOTION TO EXTEND DEADLINE FOR  
DESIGNATING PHYSICIANS AND MEDICAL EXPERTS**

Respectfully submitted,

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By:

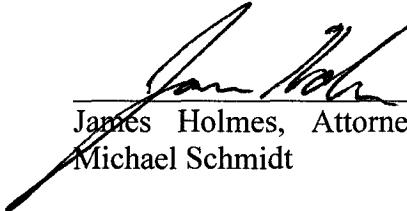
  
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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

On this 11<sup>th</sup> day of March, 2004, I conferred with opposing counsel of record for Defendant Amgen (Kathy Owen) and Defendant Wyeth (Michael Klatt) about this Motion and the relief Plaintiff seeks by it. These Defendants' counsel informed me that Defendant Amgen and Defendant Wyeth oppose this Motion and the relief sought by it.

  
\_\_\_\_\_  
James Holmes, Attorney acting on behalf of  
Michael Schmidt

**CERTIFICATE OF SERVICE**

On this 11<sup>th</sup> day of March, 2004, my office served a true and correct copy of the foregoing instrument on the following counsel of record:

***Via Certified Mail***

Michael R. Klatt  
CLARK THOMAS & WINTERS, P.C.  
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***Via Certified Mail***

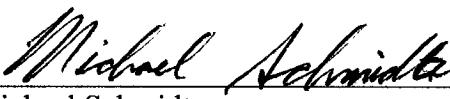
John R. Henderson  
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***Via Certified Mail***

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\_\_\_\_\_  
Michael Schmidt